

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

LATHAM & WATKINS, LLP

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Counsel for FlexGen Power Systems, LLC

In re:

Powin, LLC, *et al.*,¹

Debtors.

Case No. 25 – 16137 (MBK)

Chapter 11

(Jointly Administered)

**NOTICE OF APPEARANCE AND
DEMAND FOR SERVICE OF PAPERS**

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin, LLC [0504], (ii) PEOS Holdings, LLC [5476], (iii) Powin Project LLC [1583], (iv) Powin China Holdings 1, LLC [1422], (v) Powin China Holdings 2, LLC [9713], (vi) Charger Holdings, LLC [5241], (vii) Powin Energy Ontario Storage, LLC [8348], (viii) Powin Energy Operating Holdings, LLC [2495], (ix) Powin Energy Operating, LLC [6487]. The Debtors' mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.

PLEASE TAKE NOTICE that the undersigned hereby appears in the above-captioned cases on behalf of FlexGen Power Systems, LLC, the DIP Lender (“**FlexGen**”), and, pursuant to the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) 2002, 3017(a), 9007, and 9010(b) and section 1109(b) of chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”), hereby requests that any and all notices given or required to be given in these cases, be delivered to and served upon the person(s) listed below at the following addresses, telephone, and facsimile numbers:

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Code provision and Bankruptcy Rules specified above, but also includes, without limitation, all orders, notices, hearing dates, applications, motions, petitions, requests, complaints, demands, replies, answers, schedules of assets and liabilities and statements of affairs, operating reports, plans of reorganization and liquidation, and disclosure statements, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, hand delivery, telephone, electronic mail, or otherwise, that is filed or given in connection with the above-captioned cases and the proceedings therein.

PLEASE TAKE FURTHER NOTICE that this request shall not be deemed or construed to be a consent to the jurisdiction of the Bankruptcy Court for the District of New Jersey or a waiver of any substantive or procedural rights of FlexGen, including: (1) to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of New Jersey (the “**District Court**”); (2) to have a trial by jury in any proceeding so triable in these chapter 11 cases or any case, controversy, or proceeding related to these chapter 11 cases; (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; and (4) any other rights, claims, actions, defenses, setoffs or recoupments to which FlexGen may be entitled under agreements in law, in equity, or otherwise, including to have disputes resolved by arbitration, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: July 9, 2025
New York, New York

Respectfully submitted,

/s/ Blake T. Denton

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